



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 17, 2020

BY ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007
EngelmayerNYSDChambers@nysd.uscourts.gov

Re: *United States v. William Sadleir, 20 Cr. 320 (PAE)*

Dear Judge Engelmayer:

The Government respectfully requests that the Court enter the attached proposed protective order governing discovery materials produced by the Government to the defense in this matter.

The Government recognizes its obligation to provide discovery materials to the defendant pursuant to the United States Constitution, federal statutes, and the Federal Rules of Criminal Procedure. The Government seeks to provide these discovery materials to the defendant consistent with the need to protect the confidentiality of ongoing investigations and the confidentiality interests of other parties. The discovery that the Government intends to provide to the defendant contains materials that, if disseminated to third parties, could, among other things, impede ongoing investigations and implicate the privacy and confidentiality interests of third parties. As a result, the Government respectfully submits that there is good cause to enter the attached order.

The defendant, through counsel, consents to the entry of the proposed order.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

by: /s/
Jared Lenow
Assistant United States Attorney
(212) 637-1068

cc: Matthew L. Schwartz (via ECF and email)